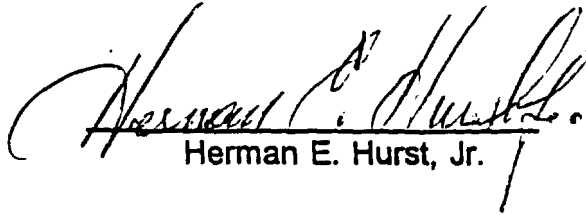
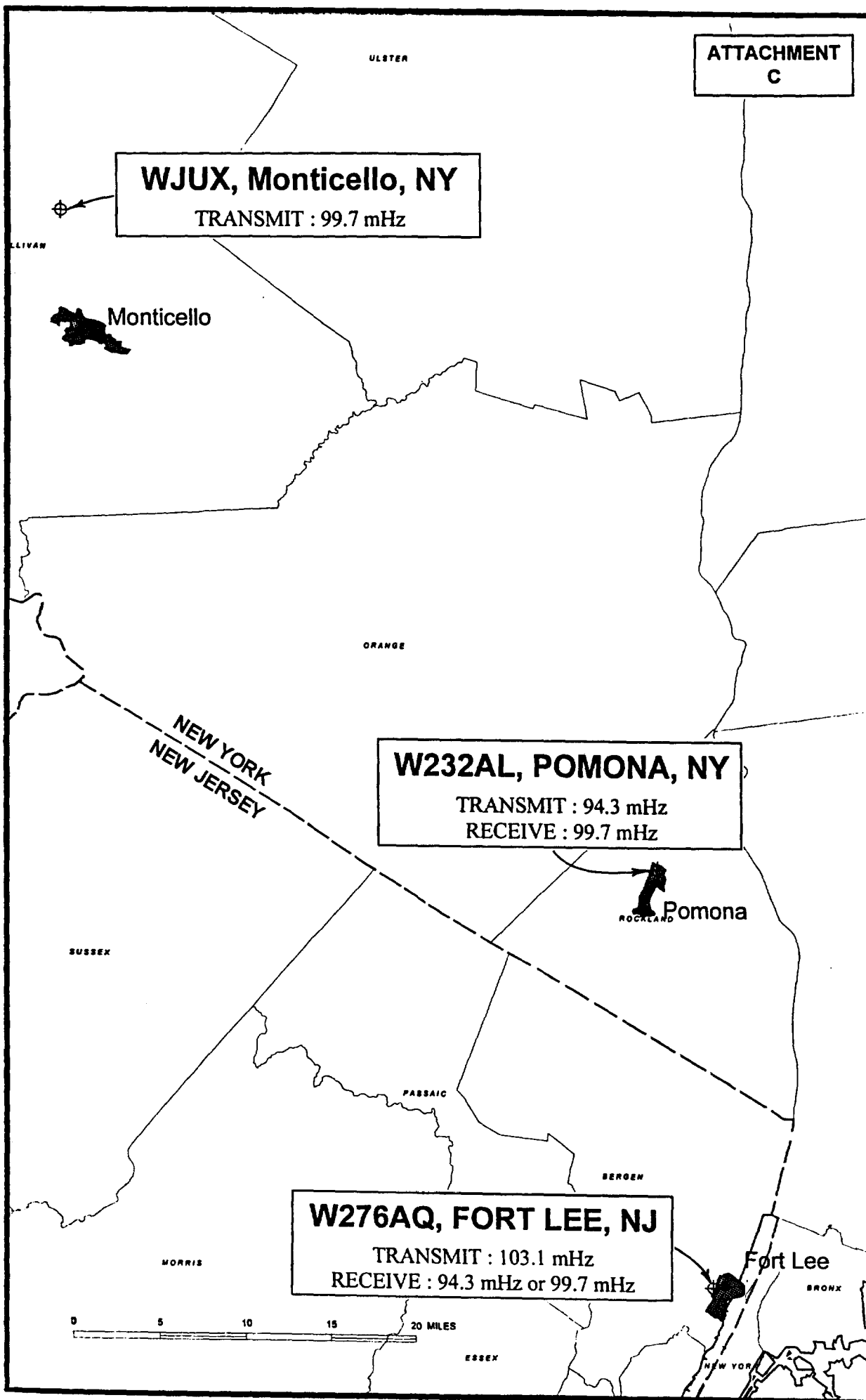


STATEMENT OF HERMAN E. HURST, JR.
PAGE 6

This statement has been prepared by me or under my direct supervision and is
believed to be true and correct.

DATED: July 25, 1995


Herman E. Hurst, Jr.



TURRO EXHIBIT NO. 3

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In re)	
)	
GERARD A. TURRO)	MM Docket No. 97-122
)	
For Renewal of License)	File Nos. BRFT-970129YC
For FM Translator Stations)	BRFT-970129YD
W276AQ(FM), Fort Lee, NJ, and)	
W232AL(FM), Pomona, NY)	
)	
MONTICELLO MOUNTAINTOP)	
BROADCASTING, INC.)	
)	
Order to Show Cause Why the)	
Construction Permit for FM Radio)	
Station WJUX(FM), Monticello, NY,)	
Should Not Be Revoked)	
To: Honorable Arthur I. Steinberg		
Administrative Law Judge		

STATEMENT OF PAUL A. EINREINHOFFER

Paul A. Einreinhofer, having been duly sworn, under penalty of perjury, states:

I am a sergeant and County Communications Officer of the Bergen County Police, Bergen County, New Jersey, and the 9-1-1 Coordinator, and in that capacity, direct the operations of the Bergen County Office of Emergency Management. I have held substantially these responsibilities since at least 1986.

In 1994, Gerard A. Turro offered to assist the Bergen County Office of Emergency Management by offering the use of the FM translator radio facilities licensed to him in Fort Lee, New Jersey, as the broadcast information outlet for Bergen County. No other radio station of any kind has offered to assist the Bergen County Office of Emergency Management in any way.

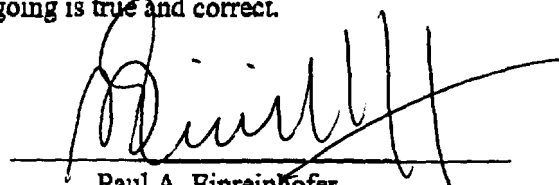
The Bergen County Office of Emergency Management has a cooperative relationship with Mr. Turro and his programming service known as Jukebox Radio. Mr. Turro has agreed to broadcast emergency messages on the Fort Lee station at 103.1 MHz in cooperation with the Bergen County Office of Emergency Management, and he has agreed to maintain technical facilities sufficient to permit the Fort Lee station to broadcast emergency messages whenever necessary. Jukebox Radio has become the official information outlet for the Bergen County Office of Emergency Management. Emergency broadcasts may give warnings of such matters as: floods, snow storms and other weather emergencies, chemical fires, and school closings. While the Bergen County Office of Emergency Management has maintained no records of emergency messages broadcast in cooperation with Jukebox Radio, nor is it required to maintain such records, I generally remember several times when emergency messages were broadcast over the Fort Lee station in cooperation with the Bergen County Office of Emergency Management. In addition, I have a letter dated February 2, 1995, in my files written to Mr. Turro in connection with this cooperative effort which I have attached to this Statement.

The cooperative arrangement between the Bergen County Office of Emergency Management and Jukebox Radio has been of significant public benefit. The Bergen County Office of Emergency Management has been able to make its 9-1-1 emergency service more effective by allowing a recorded announcement at appropriate times to direct callers to listen to 103.1 FM in the event that some emergency is underway. Mr. Turro has been exceptionally helpful in permitting his station to be the official broadcast outlet when emergency conditions threaten. Bergen County residents have come to rely on this service. This kind of public-private cooperation benefits all residents of Bergen County by improving the County's ability to enhance

health and safety generally.

Mr. Turro's counsel, Charles R. Naftalin, assisted in the preparation of this Statement.

I state under penalty of perjury that the foregoing is true and correct.


Paul A. Einreinhofer

Then personally appeared before me,
Paul A. Einreinhofer, who executed the
foregoing Statement this ____ day of October, 1997.

By: _____
Notary Public

My Commission Expires:

BERGEN COUNTY EOC

ID:21 599-2376

JUN 13'

15:05 No.002 P.01



COUNTY OF BERGEN
DEPARTMENT OF PUBLIC SAFETY
DIVISION OF EMERGENCY MANAGEMENT
327 E. Ridgewood Ave., Paramus, NJ 07652 • (201) 599-6210

William P. Schuber
County Executive

Joel Trella
County Coordinator

Edward Schmalz
Deputy Coordinator

February 2, 1995

Gerard Turro
Jukebox Radio
PO Box 888
Paramus, New Jersey 07653

Dear Mr. Turro:

This letter will confirm our recent telephone conversation regarding Bergen County's recently installed Emergency Response Telephone System, Enhanced 9-1-1. This system, which covers the County's seventy municipalities and over 860,000 residents, was developed to insure the safety and security of both the residents and travelers. In order to have the most effective system, the answering points within the County were dispersed and designed for the maximum redundancy possible.

One of our major concerns is that under certain circumstances the 9-1-1 system could become overloaded, even with the redundant nature of the system. Empirical data derived from the Edison gas pipeline explosion demonstrated the need to have an effective method of dissemination of "official information" in the event of a natural or technological disaster. To address this need the larger answering points were equipped with telephone switches that are capable of routing 9-1-1 callers to an announcement that can give a brief message about the emergency situation and where to turn for official information. It is with great sense of community service that you have agreed to perform this valuable service.

In the event that a disaster type situation occurs, translator W276AQ in Fort Lee operating at 103.1 megahertz has been designated as the official information source for the County of Bergen. Citizens would be advised to tune to this station for conditions and information broadcasts. You have agreed to provide the necessary equipment and/or facilities in order to perform this task. Within that category, this Office would request that a direct link to the translator be installed so that local programming could be originated and that this link be tested on a regular basis.

ERGEN COUNTY EOC


FM 03.1 JUKEBOX RADIO
ID:2 -599-2376

201470033
JUN 13 15:06 No.002 P.02

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Thank you for your continued cooperation and support of
Emergency Management. Be assured of our continued cooperation in
all matters of mutual concern.

Sincerely,


Paul A. Einreinhofer, Sergeant
Deputy County Coordinator

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TURRO EXHIBIT NO. 4

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In re)	
)	
GERARD A. TURRO)	MM Docket No. 97-122
)	
For Renewal of License)	File Nos. BRFT-970129YC
For FM Translator Stations)	BRFT-970129YD
W276AQ(FM), Fort Lee, NJ, and)	
W232AL(FM), Pomona, NY)	
)	
MONTICELLO MOUNTAINTOP)	
BROADCASTING, INC.)	
)	
Order to Show Cause Why the)	
Construction Permit for FM Radio)	
Station WJUX(FM), Monticello, NY,)	
Should Not Be Revoked)	
To: Honorable Arthur I. Steinberg		
Administrative Law Judge		

STATEMENT OF WILLIAM H. OWEN

William H. Owen, having been duly sworn, under penalty of perjury, states:

I was an on-air personality for the American Broadcasting Company ("ABC") in various locations from 1960 to 1990. After retiring from ABC in 1990, I held other positions in broadcasting, including with Gerard A. Turro's Jukebox Radio from 1994 to 1996, Universal Broadcasting of New York, Inc.'s ("Universal") WVNJ(AM), Oakland, New Jersey, from February, 1996, to August, 1997, and then again with Jukebox Radio from August, 1997, to the present. For both Jukebox Radio and Universal, I have produced and hosted my own music radio show.

I am personally acquainted with Vincent Luna and William Gaghan, having worked with

both of them at Jukebox Radio and at WVNJ. I have been given, and have carefully read, a Statement of Vincent Luna dated August 9, 1995, and a Statement of William Gaghan dated August 10, 1995. Both of those Statements refer to what they characterize as a "situation" at Jukebox Radio in April of 1995 which involved both Mr. Luna and Mr. Gaghan, and a third individual. Mr. Luna refers to that situation as an "attempt at deception" of an FCC inspector and Mr. Gaghan refers to that situation as "making it look like we had control of the Monticello transmitter" apparently in an attempt to deceive an FCC inspector. Mr. Turro's counsel has informed me that Mr. Luna and Mr. Gaghan each testified during their depositions that I was supposed to have been that third individual.

I produce radio programming and appear on-air. I have very limited technical knowledge in general and also have a very limited understanding of the technical operations of Jukebox Radio. Therefore, it would have been unusual for me to take part in the kind of technical actions which Mr. Luna and Mr. Gaghan describe in their Statements. I have no memory of operating remote control equipment at Jukebox Radio under Mr. Luna's direction. I have no memory of any incident at Jukebox Radio which even remotely resembled the one Mr. Luna and Mr. Gaghan describe in their Statements. The situation described by Mr. Luna and Mr. Gaghan would have been so unusual that I believe that I would remember it, but I do not.

I state emphatically that I have never participated in the deception of an FCC inspector, or any other employee of the FCC. I took part in no such deception in April of 1995 or at any other time. I would never act in such a fashion or in any way place my broadcasting career or my good name in jeopardy.

I do remember that an FCC inspector visited Jukebox Radio sometime in early 1995,

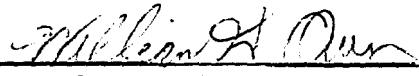
although I do not remember exactly when he visited. I do not remember his name. He came by during my shift. He was pleasant and considerate. To the best of my recollection, he visited for less than five minutes. I believe that he asked a few questions, although I do not remember what they were. There was nothing memorable about his visit.

During every on-air shift of mine at Jukebox Radio, in 1994, 1995 and since my return in 1997, there has been a one-quarter to one-half second delay, noticeable to me, between the live audio heard in the studio over the headphones plugged into the board, and the audio which comes in over the air on 103.1 MHz from the Fort Lee translator. Because I find that delay to be quite annoying, I have always been aware of it, and I would remember it if during any of my shifts that delay had disappeared. The delay has always been present. My understanding is that this delay is caused by the passage of the Jukebox Radio programming from the Dumont studio all the way to WJUX, and then all the way back to the Fort Lee translator.

It has been my observation over the course of two to three years that William Gaghan has a great personal animosity toward Mr. Turro. Even while working at Jukebox Radio, Mr. Gaghan regularly expressed his dislike of Mr. Turro and tried to antagonize him. Mr. Turro always remained calm and never retaliated against Mr. Gaghan. After leaving Jukebox Radio and while working at WVNJ, Mr. Gaghan gave the impression that it was his personal mission to destroy Jukebox Radio. Mr. Gaghan expressed views based upon inside knowledge of matters at the FCC, such as saying that the FCC really wanted "to get" Mr. Turro and that FCC action against Mr. Turro had been delayed by a death in the family of an FCC employee.

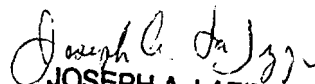
Mr. Turro's counsel, Charles R. Naftalin, assisted in the preparation of this Statement.

I state under penalty of perjury that the foregoing is true and correct.



William H. Owen

Then personally appeared before me,
William H. Owen, who executed the
foregoing Statement this 30th day of October, 1997.


JOSEPH A. LAZIZZA
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Sept. 1, 2002

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TURRO EXHIBIT NO. 5

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In re)	
)	
GERARD A. TURRO)	MM Docket No. 97-122
)	
For Renewal of License)	File Nos. BRFT-970129YC
For FM Translator Stations)	BRFT-970129YD
W276AQ(FM), Fort Lee, NJ, and)	
W232AL(FM), Pomona, NY)	
)	
MONTICELLO MOUNTAINTOP)	
BROADCASTING, INC.)	
)	
Order to Show Cause Why the)	
Construction Permit for FM Radio)	
Station WJUX(FM), Monticello, NY,)	
Should Not Be Revoked)	
)	
To: Honorable Arthur I. Steinberg		
Administrative Law Judge		

STATEMENT OF DAVID CHARLES LYNCH

David Charles Lynch, having been duly sworn, under penalty of perjury, states:

I have been an on-air talent in radio broadcasting since 1980, for the most part working in radio stations in Syracuse and Albany, New York. I have been employed by Jukebox Radio since July 1995 as an on-air personality and in producing radio shows for Jukebox Radio and its owner, Gerard A. Turro. Typically, I am at the Jukebox Radio studio in Dumont, New Jersey, from approximately 6:00 am to 2:00 pm, Monday through Friday, and I am frequently around the studio on weekends.

Although I have very limited knowledge as to the technical aspects of radio broadcasting, my understanding of the operations of Jukebox Radio is that we produce the programming at the

studio in Dumont, where I work, and then transmit that programming over telephone company lines for broadcast by WJUX(FM), Monticello, New York. The WJUX broadcasts are picked up off the air by two FM translators owned by Mr. Turro, one located in Pomona, New York, and the other in Fort Lee, New Jersey, which transmits the Jukebox Radio programming on 103.1 MHz in Bergen County. We constantly listen to Jukebox Radio over the air at the Dumont studios by tuning radios into 103.1 MHz. This is how we monitor Jukebox Radio broadcasts.

During my employment with Jukebox Radio, I remember several times, approximately four or five times, when Jukebox Radio programming went off the air completely. I do not remember the exact dates, but each time there had been an interruption in the delivery of programming along the lines between the Dumont studio and WJUX. Each time we first learned of such program delivery interruption because the broadcast on 103.1 MHz would go silent. On each of those occasions, when the program lines between the Dumont studios and WJUX were repaired, Jukebox Radio broadcasts would start up again on 103.1 MHz. I have no knowledge that there is any way for Jukebox Radio to deliver its programming to the Fort Lee translator except over the air from WJUX, although Mr. Turro has told me that we are able to broadcast emergency messages from the Fort Lee translator, I have no recollection of ever doing so, and I do not know how to do so. To my knowledge, there has never been a time when Jukebox Radio programming was transmitted by the Fort Lee translator when WJUX was not transmitting.

In addition, I remember two more times when we had trouble, although I am not sure of exactly when. Once, the Pomona translator lost the signal of WJUX and the Fort Lee translator started transmitting the signal of a station in Maryland which operates on 99.7 MHz. I remember that incident because we received a lot of calls from the public about it because that Maryland

station broadcast Christian programming which is very different from Jukebox Radio programming. The other problem I remember is when lightening struck the Pomona translator and the Fort Lee translator started broadcasting a Long Island station which operates on 94.3 MHz. We got a lot of calls from the public about that incident too.

In my experience, every time there was a problem with transmission of Jukebox Radio programming, either over the lines from the Dumont studio or with one of the translators, we lost reception of Jukebox Radio programming on 103.1 in Dumont. I have never been instructed as to raising or lowering the power remotely of the transmitters at the Fort Lee translator or at the Monticello station, nor has there ever been a need to do so. To the best of my knowledge, there is no technical ability to raise or lower transmitter power remotely. To the best of my knowledge, there are no meters in the Dumont studio which provide remote output for the Fort Lee transmitters.

During every on-air shift of mine at Jukebox Radio, since I started in July of 1995, there has been a slight audio delay between the live audio heard in the studio over the headphones plugged into the board, and the audio which comes in over the air on 103.1 MHz from the Fort Lee translator. I believe that I would remember it if during any of my shifts that this delay had disappeared, but it has always been present. My understanding is that this delay is caused by the passage of the Jukebox Radio programming from the Dumont studio all the way to WJUX, and then all the way back to the Fort Lee translator.

In my experience, Jukebox Radio is very community minded. We broadcast news, weather and public service programming routinely. We support benefits regularly and usually have several remote location broadcasts a month. While a majority of our public service oriented

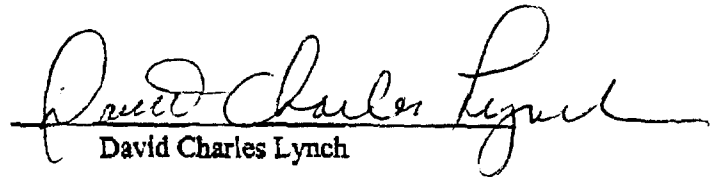
programming is centered around Bergen County, we regularly include a significant amount of material for Sullivan County. For example, we provide Sullivan County weather and reports temperature throughout the day. We receive fax updates for that area three times a day from the National Weather service and make sure that the public hears it. We routinely air community news and information from the Sullivan County area and we have originated a number of remote broadcasts from Sullivan County. We have a strong public following there.

I remember one strange incident from the summer of 1996, I believe from approximately July. Jukebox Radio was operating a remote broadcast from the Annual Bergenfield Sidewalk Sale. Mr. Turro and I had taken a break and were eating lunch in the Beehive restaurant. During the course of that meal, a large, dark haired man wearing a tank top approached our table and shouted at Mr. Turro: "I hope you choke on that sandwich!" While I cannot remember everything he said, he also shouted: "You've ruined a lot people!" and "You're going down Turro, you're going down!"


That man was clearly angry and threatening. I was shocked by his behavior. Mr. Turro remained calm, asked him to settle down and even invited him to sit down. The man refused to sit, he just turned his back and left. I immediately asked Mr. Turro who that was, and he told me it was Bill Gaghan.

Mr. Turro's counsel, Charles R. Naftalin, assisted in the preparation of this Statement.

I state under penalty of perjury that the foregoing is true and correct.


David Charles Lynch

Then personally appeared before me,
David Charles Lynch, who executed the
foregoing Statement this 5th day of November, 1997.


JOSEPH A. LAZIZZA
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Sept. 1, 2002

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TURRO EXHIBIT NO. 6

STATEMENT OF CHUCK GARLAND

1. I, CHUCK GARLAND, STATE AS FOLLOWS:


2. I RESIDE AT 17 INDIAN TRAIL ROAD, RANDOLPH, NEW JERSEY. I AM CURRENTLY EMPLOYED BY AT&T IN A MANAGEMENT POSITION. I HAVE BEEN EMPLOYED AS A PART TIME ON-AIR TALENT AT JUKEBOX RADIO SINCE SEPTEMBER, 1994.

3. I HAVE READ THE STATEMENT OF VINCENT D. LUNA DATED 10/22/97. I HAVE NO RECOLLECTION OF THE MONTICELLO OFF AIR INCIDENT THAT MR. LUNA REFERS TO IN HIS STATEMENT. IF SUCH AN INCIDENT HAPPENED, WITH A FLASHING STROBE LIGHT AND CALLS FROM LISTENERS IN MONTICELLO CLAIMING THAT JUKEBOX RADIO WAS OFF THE AIR, I THINK I WOULD HAVE REMEMBERED SUCH AN INCIDENT.

4. I DO REMEMBER THAT THERE WAS AN OUTAGE IN MONTICELLO, THAT THE FORT LEE TRANSLATOR DISCONTINUED BROADCASTING JUKEBOX RADIO. I CAN CLEARLY RECALL A SPECIFIC INCIDENT WHEN MONTICELLO WAS OFF THE AIR AND 103.1 FM IN FT. LEE WAS OFF THE AIR DUE TO A CABLE BREAK OF NEW YORK TELEPHONE IN POUGHKEEPSIE, NY.

5. I DO NOT RECALL ANY CIRCUMSTANCES THAT MONTICELLO WAS OFF THE AIR AND 103.1 FM WAS ON THE AIR.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF, EXECUTED THIS 1ST DAY OF NOVEMBER, 1997.


CHUCK GARLAND


JOSEPH A. LAZIZZA
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Sept. 1, 2002

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7

TURRO EXHIBIT NO. 7

CARL T. JONES
CORPORATION

STATEMENT OF JOHN E. HIDLE
REGARDING THE OPERATION OF
W276AQ, FORT LEE, NEW JERSEY,
W232AL, POMONA, NEW YORK, AND
WJUX(FM), MONTICELLO, NEW YORK
CHANNEL 259A - 6.0 kW ERP - 91 M HAAT

I am a Consulting Engineer, an employee in the firm of Carl T. Jones Corporation with offices in Springfield, Virginia. I am a Registered Professional Engineer in the Commonwealth of Virginia, Registration No. 7418, and in the State of New York, Registration No. 63418. A resume setting forth my education and experience is attached.

I have personally inspected the technical facilities and operation of the above named broadcast station and the two FM translators. I have also inspected the program origination facilities of Juxbox Radio in Dumont, New Jersey. Attachments 1 - 4 depict the operational configuration of these facilities.

The WJUX(FM) studio facility at Ferndale, New York delivers the output of its Broadcast Electronics audio mixing console through an audio switcher to a telephone company (TELCO) provided 15 kHz equalized audio program line to the WJUX(FM) transmitter site.

The WJUX(FM) transmitter site is equipped with an Energy-Onyx transmitter with associated transmit antenna and other ancillary devices including, but not limited to, a

STATEMENT OF JOHN E. HIDLE
REGARDING THE OPERATION OF W276AQ, FORT LEE, NEW JERSEY
W232AL, POMONA, NEW YORK, AND WJUX(FM), MONTICELLO, NEW YORK
PAGE 2

backup AC power generator and a 500 watt backup transmitter. The audio input to the transmitters is switchable by dial-up remote control to either 1) the WJUX(FM) studio output delivered by TELCO 15 kHz audio circuit or 2) the Juxbox Radio program audio delivered by TELCO 56 kbit digital data circuit.

The Juxbox Radio program is created at a studio facility located in Dumont, New Jersey. This facility contains both program creation and audio production control rooms; however, Attachment 1 shows only the audio equipment determined to be utilized in direct real time program creation.

The FM translator W232AL, Pomona, New York, which translates the signal from WJUX(FM), is shown in block form in Attachment 2. Except for the Scala receive antenna, which is mounted near the top of the tower, and the 99.5 MHz cavity notch filter inside the building, the equipment is located in a single full height 19" equipment rack. The transmitter consists of an FM exciter the output of which is connected to the transmit antenna also mounted on the tower.

The FM translator W276AQ, Fort Lee, New Jersey, is shown in Attachments 3 and 4. Attachment 3 shows the normal operation of W276AQ, which is translating the signal from W232AL. The Scala receive antenna is mounted on the building roof oriented toward Pomona, New York providing line-of-sight reception of the signal from W232AL. Except for the W276AQ transmitting antenna, the other equipment shown in Attachment 3 is mounted in a full height 19" equipment rack located in a small room on the 24th floor.

STATEMENT OF JOHN E. HIDLE
REGARDING THE OPERATION OF W276AQ, FORT LEE, NEW JERSEY
W232AL, POMONA, NEW YORK, AND WJUX(FM), MONTICELLO, NEW YORK
PAGE 3

Attachment 4 shows the equipment which provides the capability for W276AQ to directly translate the WJUX(FM) signal. The audio switcher and transmitter is the same as in Attachment 3. The Scala CA-2 receive antenna is mounted on the building roof. The 99.5 MHz cavity notch filter and the Sony XR2500 receiver are installed inside a locked weatherproof metal equipment enclosure also on the roof. The other equipment shown in Attachment 4 is located in the same 19" equipment rack which contains the equipment shown in Attachment 3.

At the Pomona, New York site utilized by W232AL signal level measurements were made. A Scala CA-2 receive antenna is mounted near the top of the tower. Its output is fed by RF coaxial cable to the 99.5 MHz cavity notch filter in the building. A short RF coaxial cable then connects the signal to the RF input of the Sony XR2500 receiver. A 3 dB signal splitter was used to facilitate RF signal level measurements. A Hewlett-Packard (HP) spectrum analyzer, Model 8568B, was connected to the RF line before the notch filter and signal levels were observed. FM radio station signals at 99.3 MHz = -70.9 dBm, 99.5 MHz = -79.3 dBm, 99.7 MHz = -80.0 dBm and 99.9 MHz = -70.4 dBm were present. The HP analyzer was then connected at the filter output/receiver input. At this point the signals at 99.3 MHz and 99.5 MHz disappeared below the analyzer noise floor. The WJUX(FM) signal at 99.7 MHz was measured to be -82.7 dBm and the signal 99.9 MHz was -73.7 dBm. Therefore the desired signal from WJUX is 26 dB above the minimum usable sensitivity of the Sony receiver used at the Pomona translator site.